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November 15, 1995

Joseph Cosentino, OSC  
Removal Action Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region II  
2890 Woodbridge Avenue  
Edison, NJ 08837

Dear Mr. Cosentino:

Enclosed is the response of Lucas Industries, Inc. to the CERCLA § 104(e) request dated September 28, 1995 related to the Bayonne Barrel and Drum Superfund Site. The enclosure is a fax of the response. The signed original will follow by mail. Please call me if you have any questions.

Very truly yours,

  
John S. Guttman

Enclosure:  
As Stated

cc: Marc Seidenberg, Esq., EPA Region II  
Robert Leier, Esq., Lucas Industries, Inc.

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# Lucas

Lucas Industries Inc.  
11180 Sunrise Valley Drive  
Reston, Virginia 22091-4361

Telephone: (703) 620-8901  
Fax: (703) 620-8905

November 15, 1995

Joseph Cosentino, OSC  
Removal Action Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region II  
2890 Woodbridge Avenue  
Edison, NJ 08837

with a copy to:

Marc Seidenberg, Esq.  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 17th Floor  
New York, NY 10007

**RE: Request for Information Pursuant to Section 104(e) of CERCLA, 42 U.S.C.  
§ 9604(e); Bayonne Barrel & Drum, Superfund Site, 150-154 Raymond Boulevard,  
Newark, Essex County, New Jersey**

Dear Mr. Cosentino:

The following information is provided in response to the above Request for Information and is being submitted in a timely manner in keeping with an extension of time in which to respond which was previously requested by the respondent and granted by the Environmental Protection Agency. Responses to the specific requests are set out below.

- 1.a. Lucas Automation & Control Engineering, Inc.
- 1.b. The Company is a Virginia corporation incorporated on June 20, 1968 with an address at 1000 Lucas Way, Hampton, Virginia 23666-1573; telephone 804-766-1500.
- 1.c. President and Chairman: John Berkenkamp whose address is 1000 Lucas Way, Hampton, Virginia 23666-1573.

- 1.d. The Company has no subsidiaries, but is a wholly-owned subsidiary of Lucas Industries Inc., a Michigan corporation whose address is 11180 Sunrise Valley Drive, Reston, Virginia 22091-4361. The President of Lucas Industries Inc. is James Zigel whose address is 11180 Sunrise Valley Drive, Reston, Virginia 22091-4361. The Chairman of Lucas Industries Inc. is John Grant whose address is Brueton House, New Road, Solihull, West Midlands, England B91 3TX.
- 1.e. The Company is a successor by merger to Lucas Duralith Corporation which merged into Lucas Automation & Control Engineering, Inc. on July 31, 1992. Lucas Duralith Corporation was a New Jersey company incorporated on February 2, 1979 with an address at 525 Orange Street, Millville, New Jersey 08332. The President of Lucas Duralith Corporation prior to its merger was Harry Cloud whose address is 525 Orange Street, Millville, New Jersey 08332. The Chairman of Lucas Duralith Corporation prior to its merger was John Berkenkamp whose address is 1000 Lucas Way, Hampton, Virginia 23666-1573.
- 1.f. The Company has no information that it has ever transacted business with Bayonne Barrell & Drum.
- 2.a. The Company nor any Company facility has ever transacted any business with Bayonne Barrell & Drum nor had any relationship, contracts or agreements with Bayonne Barrell & Drum.
- 2.b. See response to 2.a. above.
3. Because the Company has had no dealings with Bayonne Barrell & Drum, there are no individuals or companies who have knowledge of facts relating to the subject of the inquiry.
4. The persons consulted in responding to these questions and the questions on which they were consulted are as follows:
- |                 |   |             |
|-----------------|---|-------------|
| Robert A. Leier | - | Question #1 |
| Sarah Glorioso  | - | Question #1 |
| Harry Cloud     | - | Question #2 |
| Robert Mulford  | - | Question #2 |
5. Due to the fact that we have no information relating to any possible event or occurrence which could give rise to liability under CERCLA, we are unable to identify an insurance policy which might apply to a specific period of time or type of occurrence which might eventually be identified.

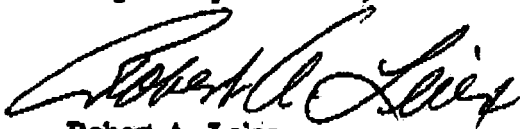
Joseph Cosentino, OSC

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6. The property in Millville, New Jersey formerly occupied by Lucas Duralith Corporation is currently leased to Silvercloud Manufacturing Company, Inc. The lease for that property in Section 5.05 provides an indemnity from the Tenant to the Landlord (Lucas Automation & Control Engineering, Inc.) for claims arising from Tenant's use of the property including any presence or use of hazardous material caused or permitted by Tenant (copy of lease attached to this response). We have no information that the Tenant has caused any activity or occurrence at the property which would give rise to a claim to which this indemnity attaches.
7. We have no information of any source of disposal or transportation of containers to the Bayonne Barrell & Drum Site.

Respectfully submitted,



Robert A. Leier  
Assistant General Counsel

Certification attached hereto.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Virginia

County of Fairfax

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Robert Leier  
NAME (print or type)

Assistant General Counsel  
TITLE (print or type)

  
SIGNATURE

Sworn to me before this

15th day of November 1995

